



August 23, 2021

VIA ECF

Hon. J. Paul Oetken, U.S.D.J.
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 706
New York, NY 10007

Re: *In re Mylan N.V. Securities Litigation*, 16-cv-07926 (JPO)—Letter Motion for
Leave to File Under Seal

Dear Judge Oetken:

We are Class Counsel for Class Representatives (the “Class” or “Class Representatives”) in the above-referenced action (the “Action”). Pursuant to Rule 2.E of Your Honor’s Individual Practices, we submit this letter motion for leave to file under seal (“letter motion to seal”) Exhibits C through F, H and I, of the Declaration of Terrence W. Scudieri, Jr. (the “Scudieri Declaration”), filed in support of Class Representatives’ Letter Motion to Compel Production of Improperly Withheld Documents, filed contemporaneously.

The Class submits this letter motion to seal only out of an abundance of caution. Exhibits C, D, H, and I to the Scudieri Declaration are documents that have been designated by Defendants as “OUTSIDE COUNSEL EYES ONLY” under the Stipulated Protective Order entered by the Court on September 10, 2020 (ECF. No. 165) (the “Protective Order”). Exhibit E is a document that contains information that has been designated by Defendants as “OUTSIDE COUNSEL EYES ONLY” under the Protective Order. Finally, Exhibit F is a document that is currently designed as “HIGHLY CONFIDENTIAL” pursuant to paragraph 4.2(f)(ii) the Protective Order. The Class does not take a position on the propriety of these designations.

Accordingly, Exhibits C through F, H and I to the Scudieri Declaration have been filed under seal.

Respectfully Submitted,

By: /s/ Austin P. Van
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Class Counsel

cc: All counsel of record (via ECF)